

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Kelvin A Lashley
Debtors

CHAPTER 13

Federal Home Loan Mortgage Corporation,
as trustee for Freddie Mac Seasoned Credit
Risk Transfer Trust, Series 2017-2, as owner
of the Related Mortgage Loan,
Movant,

BANKRUPTCY CASE NUMBER
22-12284

v.

Kelvin A Lashley,
Respondent/Debtors,
and
Kenneth E. West, Office of the Chapter 13
Standing Trustee, Trustee,
Additional Respondent.

**OBJECTION OF FEDERAL HOME LOAN MORTGAGE CORPORATION, AS
TRUSTEE FOR FREDDIE MAC SEASONED CREDIT RISK TRANSFER TRUST,
SERIES 2017-2, AS OWNER OF THE RELATED MORTGAGE LOAN TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Federal Home Loan Mortgage Corporation, as trustee for Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2017-2, as owner of the Related Mortgage Loan, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about August 31, 2022, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by a mortgage lien on real estate which is not the principal residence of Debtor located at 34 Ashmead Place South, assessed as 34 South Ashmead Place, Philadelphia, PA 19144.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$95.00.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.
5. In addition, Debtor's Proposed Chapter 13 Plan does not specifically state the amount of the ongoing monthly post-petition payments, which are currently \$680.18. Secured

Creditor requires full monthly post-petition payments owed to Secured Creditor under the terms of the Note and Mortgage.

6. Further, the Debtor's Proposed Plan does not include this objecting Secured Creditor under any section of the Debtor's Bankruptcy Plan.

7. The Plan fails to comply with 11 U.S.C. § 1322.

8. The Plan fails to comply with 11 U.S.C. § 1325.

9. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Federal Home Loan Mortgage Corporation, as trustee for Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2017-2, as owner of the Related Mortgage Loan respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: September 26, 2022

By: /s/ Christopher A. DeNardo
Christopher A. DeNardo 78447
Lorraine Gazzara Doyle 34576
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LLG File #:14-045938

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CERTIFICATE OF SERVICE

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Federal Home Loan Mortgage Corporation, as trustee for Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2017-2, as owner of the Related Mortgage Loan's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on September 26, 2022:

Alexander G. Tuttle, Esquire
2303 North Broad Street, Suite 2
Colmar, PA 18915
Sent via electronic notification agt@tuttlelegal.com

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

/s/ Christopher A. DeNardo

Christopher A. DeNardo 78447
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800

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